

Torres, Francine

From: angela@rishi-tea.com%inter2 [angela@rishi-tea.com] on behalf of angela@rishi-tea.com
Sent: Thursday, August 11, 2005 4:38 PM
To: National List
Subject: Docket Number TM-0407
Attachments: ATTACHMENT.TXT

To Whom It May Concern:

My name is Angela DeStefanis and I am the Organic Compliance Manager at Rishi Tea in Milwaukee, WI. I am writing regarding the review of the 165 synthetic and non-synthetic substances used in organic production and handling that will be taking place in anticipation of the current list's expiration on October 21, 2007.

I am formally requesting, on behalf of Rishi Tea, that the USDA AMF continue to allow all materials currently on the National List in organic production and handling, provided they have not been deemed harmful. We would, in fact, like to see more substances approved.

Rishi Tea has been directly impacted by the regulations surrounding acceptable flavor carriers. While only 8% of our organic product line uses a flavor component, this segment of our offerings generates 14% of our revenue. Our experience shows that the American public likes a flavored tea product. We feel we can reach a wider consumer base by marketing flavored teas and botanical blends along side our unflavored varieties, exposing and educating them on the benefits of organic products for themselves and the environment.

While we support organic production whole-heartedly, as evidenced by our largely organic tea line, organic flavors can be cost prohibitive and don't tend to have the same flavor impact as organic-compliant flavors. One chemist explained to me that the carriers amplify the flavors, thereby making it possible to use less of them and lower the cost of the final product. Therefore, more people have access to the product. After all, if more people are able to afford organic products and begin to purchase organic products more frequently, the market will respond by providing more affordable organic products. Clearly, this will benefit all entities involved in the organic equation.

In closing, I'd like to suggest that you consult with reputable flavor companies to discuss naturally derived flavor additives that might be added to the list of approved substances. Perhaps this would make an impact on this industry which seems to be lagging in their understanding of the usage of flavorings in organic products.

Thank you for your consideration of our request.

Sincerely,

Angela DeStefanis
Rishi Tea

8/15/2005